



# **Office of the Administrative Assistant to the Secretary of the Army**

---

## **Records Management Declassification Agency**

**&**

## **Army Publishing Directorate**

## **Social Security Number Reduction Plan**

**11 February 2009**

Ms. Doloras Johnson  
Army Privacy Office  
(703) 428-6832  
doloras.johnson@us.army.mil

Mr. Robert Dickerson  
Chief, Army Privacy Office  
(703) 428-6513  
robert.dickerson1@us.army.mil

Ms. Cris Carpi  
Chief, Forms Management  
Branch  
(703) 325-6297  
cris.carpi@hoda.army.mil

---

***Office of the Administrative Assistant to the  
Secretary of the Army***

---



# AGENDA

---

- Authority
- Scope
- Roles & Responsibilities
- Basic Procedural Requirements
- Justification Analysis
- Lessons Learned
- Questions



# AUTHORITY

---

Directive-Type Memorandum 07-015-USD(P&R) –  
“DoD Social Security Number (SSN) Reduction Plan” dated 28  
Mar 08

President's Task Force on Identity Theft Strategic Plan, April  
2007

DoD Senior Privacy Official Memorandum, "Personally  
Identifiable  
Information," April 27, 2007

The Privacy Act of 1974, Title 5 U.S.C 552a

DoD 5400.11-R, "DoD Privacy Program," May 14, 2007



# Scope

---

- All DA Forms that collect Social Security Numbers (SSNs)
  - Approximately 500 must be reviewed
  - Goal is to Eliminate SSN's if at all possible
- DA Forms with continued need for collection of SSN's:
  - Must have an approved Justification for Truncating or masking SSN's
  - Justification based on acceptable uses in DTM for continued use
  - GO/SES must sign justification
  - Army Forms Manager is approving Official for signed Justifications
- DoD will direct reviews of DD & SD Forms for which the Army is the proponent
- Army status/progress to be reported in July 09 FISMA submission



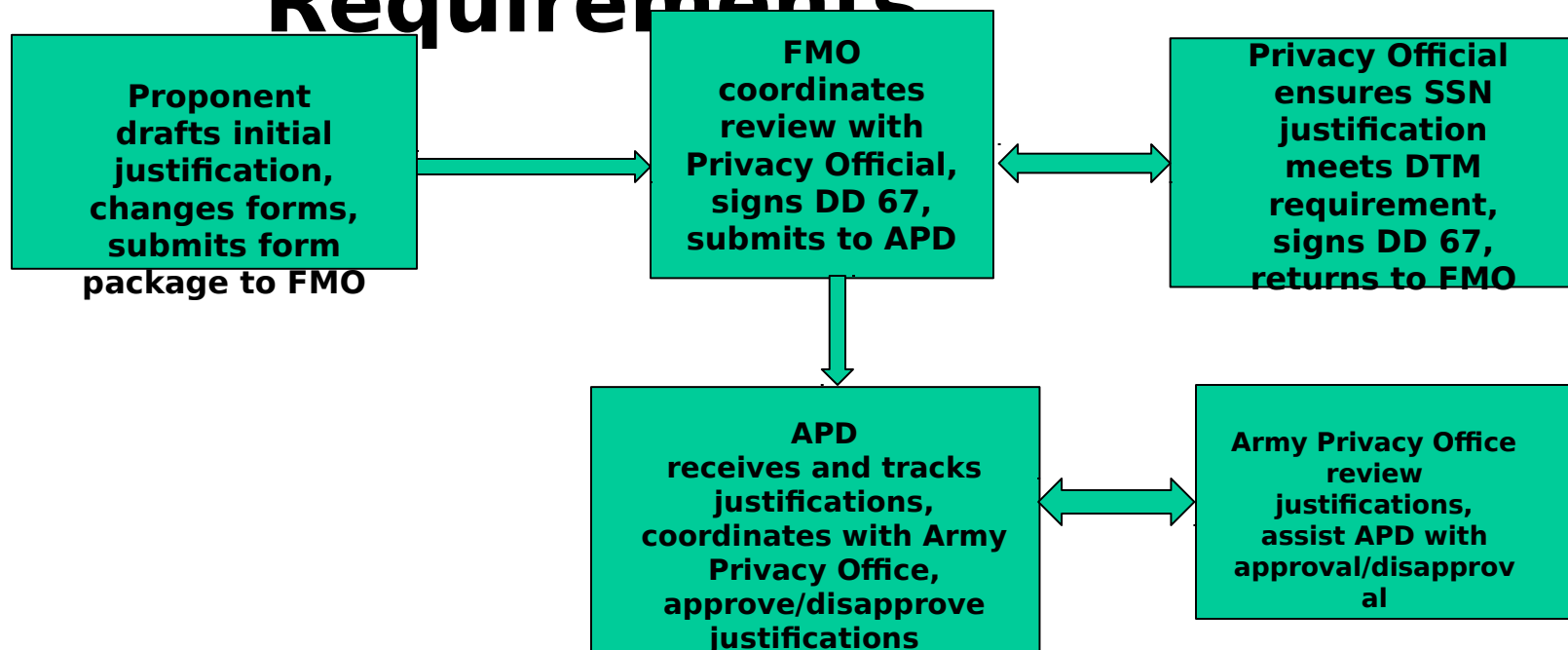
# Roles & Responsibilities

---

- APD Forms Managers, Proponents & Army Privacy Office
  - Are charged with reducing SSN usage throughout the Army
  - Must be convinced that continued use is appropriate
  - Review and approve/disapprove SSN use justifications
  - Ensure compliance with DTM and basis for acceptable uses
- Forms Managers, Proponents & Privacy Officials at the Headquarters level will
  - Perform a one-time initial review of all existing forms (July 09)
  - Periodically review new forms (3 year reporting)
  - Review will validate continued SSN use or identify SSN elimination
    - ✓ Include Privacy Officials in review (block 15 e of DD Form 67)
  - Revise forms, draft and submit SSN justification along with DD Form 67
    - ✓ Justifications must be signed by SES/GO
    - ✓ Must correlate with one or more DTM acceptable uses
    - ✓ Must provide convincing rationale for continued use
- DoD Forms Management Office *Office of the Administrative Assistant to the Secretary of the Army*
  - Review SSN use justifications on DD and SD forms and report



# Basic Procedural Requirements





# Basic Procedural Requirements

## (cont)

- Acceptable SSN uses
  - Provided for by law
  - Require interoperability with organizations beyond DoD
  - Required by operational necessities
    - ✓ result of the inability to alter systems, processes, or forms due to
      - cost
      - unacceptable levels of risk
- Forms that claim “operational necessity”
  - Will be closely scrutinized
  - Ease of use or unwillingness are not acceptable justifications
- It is unacceptable to collect, use, retain, or transfer SSN along with any other Personally Identifiable Information (PII) without approved justification
- Explore alternatives to SSNs such as biometrics, electronic data interchange, system-generated identifiers, net-centric environments, email address

---

**Office of the Administrative Assistant to the  
Secretary of the Army**

- If disapproved, proponents must submit a plan for elimination with timeline



# **Justification Analysis**

---

- (1) Geneva Conventions Serial Number – SSN is necessary to fulfill Geneva Convention requirements to identify authorized combatants
- (2) Law Enforcement, National Security, Credentialing – SSN is needed to perform background checks and verify criminal history of persons involved in criminal activities and employees working in law enforcement
- (3) Security Clearance Investigation or Verification – SSN necessary to conduct background checks on employees
- (4) Interactions With Financial Institutions – SSN is needed in order deposit funds and open accounts
- (5) Confirmation of Employment Eligibility – SSN is necessary to prove eligibility to work or with the U.S. government
- (6) Administration of Federal Worker's Compensation – SSN is needed to facilitate payments and benefits





# Justification Analysis

---

(Cont)

- (7) Federal Taxpayer Identification Number – SSN is needed to report earnings and other information to state and federal taxation authorities
- (8) Computer Matching – SSN is necessary to compare data on individuals with other federal agencies
- (9) Foreign Travel – SSN is needed to obtain passport
- (10) Noncombatant Evacuation Operations (NEOs) – SSN required by the  
State Department as persons are repatriated to the U.S.
- (11) Legacy System Interface – SSN is needed to report and verify data  
with other DoD systems  
Use only if no other Acceptable Use applies  
Transition to another identifier cost prohibitive  
Only valid for limited period to time  
Plan for elimination with timeframe must accompany justification

---

**Office of the Administrative Assistant to the  
Secretary of the Army**

---

- (12) Other Cases – Sufficient grounds and documentation must be



# Lessons Learned

---

- APD and Army Privacy Office cannot draft your justification
  - Our role is to eliminate SSNs
- Workload scope prohibits special considerations and priorities
- Justification preparation and staffing can be time-consuming – plan accordingly based on your organizational needs
- Consider related publications and system requirements as you prioritize justification submissions
- Incremental submission of justifications will allow timely action
- Ensure you closely adhere to the Acceptable Use cases
- Be brief and do not include unnecessary information in your justifications
- Ensure justifications are complete, accurate, and non-contradictory
- Be thorough and accurate: we cannot review duplicative justifications

---

**Office of the Administrative Assistant to the**

- Secretary of the Army**
- Justifications are not ~~secretary of the Army~~ will be reinitiated in the future



---

# Questions?